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ICS/62/2

20 January 2003

Docket Clerk
U.S. DOT Dockets
Room PL-401
400 Seventh Street, SW
Washington
DC 20590-0001
United States of America

Dear Sir,

Reference: Docket No. SLSDC 2002-13698 - 5
Seaway Regulations and Rules: Automatic Identification System (AIS)

1. The International Chamber of Shipping (ICS), representing more than half of the world's merchant shipping tonnage, is most grateful for the opportunity to comment on the proposed rule mandating the use of AIS in the St Lawrence Seaway. The following comments reflect the view of shipowners from an international perspective.
2. The recent Diplomatic Conference on Maritime Security (International Maritime Organization December 2002) adopted a number of changes to the International Convention for the Safety of Life at Sea (SOLAS), 1974. These changes were all in support of improving maritime security and included a requirement for all vessels above 300 gross tonnage to carry and operate AIS by 1 July 2004. This represents a change to the previous SOLAS requirement which provided a staged carriage requirement up to 2008, by which time all vessels subject to SOLAS would have been fitted.
3. The short-notice requirement to carry AIS some four years earlier than either the shipping industry or electronic manufacturers were expecting has had a major impact on both. The manufacturers are now concentrating their efforts on producing sufficient AIS terminal equipment to meet the needs of some 45,000 internationally trading ships in about 18 months. This effort is at the expense of the production of integrated equipment which would have provided a useful display on the bridge of a ship. The lack of type approved equipment AIS equipment and the lack of capacity to type approve radar-integrated AIS, dictates that most ship owners will equip their fleet with the, so called,

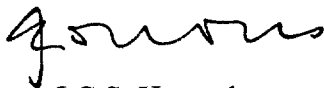
minimum mandated display which although providing the transmission of AIS data is too small to be of practical use on the bridge for situational awareness purposes.

4. It should also be noted that recent US domestic legislation on Homeland Security requires the carriage and operation of AIS in all ships trading to United States ports from July 2004, a date coherent with the change to SOLAS.

5. The international shipping industry is dismayed that the St Lawrence Seaway is proposing to mandate the use of AIS in advance of the internationally agreed dates for AIS carriage and the date already incorporated into US Homeland Security legislation. The difficulties faced by both equipment manufacturers and ship owners in obtaining, fitting and calibrating AIS equipment to ships in time to meet the new SOLAS dates have already been alluded to. It is for consideration that these world-wide difficulties will make it extremely difficult for owners to obtain AIS equipment in time to meet the proposed St Lawrence Seaway date of 25 March 2003.

6. The St Lawrence Seaway Management Corporation is strongly urged to reconsider the date for adopting an AIS requirement and in so doing to conclude that a more appropriate and manageable date would be July 2004 in accordance with the SOLAS convention.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J.C.S. Horrocks', written in a cursive style.

J.C.S. Horrocks
Secretary General